

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

JASON FRY, individually and on behalf of all
others similarly situated,

Plaintiff,

v.

PEOPLECONNECT, INC.,

Defendant.

NO. 2:21-cv-01222-MJP

JOINT MOTION AND [PROPOSED]
ORDER TO EXTEND DEADLINE FOR
DEFENDANT TO ANSWER OR
OTHERWISE RESPOND TO
PLAINTIFF’S COMPLAINT

NOTE ON MOTION CALENDAR:
September 29, 2021

PeopleConnect, Inc. (“Defendant”) and Jason Fry, on behalf of himself and all others
similarly situated (“Plaintiff”), by and through their undersigned counsel, respectfully move for a
thirty (30) day extension of time for Defendant to answer or otherwise respond to Plaintiff’s
complaint. In support of this Motion, the Parties state as follows:

1. Plaintiff filed a class action complaint on September 7, 2021 (ECF No. 1).
2. Plaintiff served Defendant with the complaint on September 10, 2021 (ECF No. 4).

Accordingly, Defendant currently must answer or otherwise respond to Plaintiff’s complaint by
October 1, 2021.

1 3. On September 22, 2021, Defendant's counsel sent a letter to Plaintiff's counsel
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3 stating that "Mr. Fry is a current member of Classmates.com and has been for more than 15 years,
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5 having created a Classmates account in 2004."

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7 4. On September 24, 2021, Plaintiff's counsel asked that Defendant's counsel
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9 "provide the information upon which you base this assertion, such as account details purportedly
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11 associated with Mr. Fry." In exchange for Defendant providing this information so that Plaintiff's
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13 counsel could verify it with Mr. Fry, Plaintiff's counsel agreed to an extension of time for
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15 Defendant to answer or otherwise amend.

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17 5. On September 24, 2021, Defendant's counsel provided the email address associated
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19 with an account Defendant states was created by Mr. Fry, along with screenshots depicting the
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21 profile on Classmates.com.

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23 6. To facilitate the parties' investigation of these issues, Defendant and Plaintiff agree
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25 to a thirty (30) day extension of time for Defendant to respond to Plaintiff's complaint, which would
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27 extend Defendant's time to respond to November 1, 2021.

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29 WHEREFORE, for the reasons stated herein, the Parties respectfully request that this
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31 Court grant this Motion and enter an Order extending the deadline for Defendant to respond to
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33 Plaintiff's complaint by thirty (30) days, up to and including November 1, 2021.
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DATED this 29th day of September, 2021.

PEOPLECONNECT, INC.

JASON FRY

s/ Brent Caslin

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Attorneys for Plaintiff Jason Fry

Attorneys for Defendant PeopleConnect, Inc.

IT IS SO ORDERED.

Marsha J. Pechman
U.S. District Judge

DATE: _____, 2021